

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

2:15-cr-472-RMG

United States of America,

vs.

Dylann Storm Roof

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**EX PARTE MOTION FOR A SUBPOENA *DUCES TECUM* AND ORDER FOR THE  
PRE-TRIAL PRODUCTION OF DOCUMENTS PURSUANT TO FEDERAL RULES OF  
CRIMINAL PROCEDURE RULE 17(b) & 17(c)**

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Comes now the Defendant through his undersigned attorneys who asks this Court to issue a subpoena *duces tecum* to the Chief Jailer for the Charleston County Detention Center, W. Beatty, to appear in the United States District Court for the District of South Carolina, Charleston Division, at a time to be determined and to bring with him or her the following documents (the defendant will file a pre-trial motion which will be informed in part by the documents sought by this subpoena):

1. Charleston County Detention Center Rules for Inmates in effect as of the June 18, 2015;
2. The complete inmate file for the Defendant;
3. The Classification Interview Form signed by the Defendant.
4. Any and all forms signed by the Defendant in which he acknowledged that he had received the Charleston County Rules for Inmates;
5. All documents relevant to the removal and copying of any and all writings from the Defendant's cell including but not limited to letters, notes, memoranda, reports of any kind, any and all documents relevant to the chain of custody of any writings seized or copied from the Defendant's cell, any and

all documents which indicate the identity of the person or persons who ordered the seizure of any writings seized from the Defendant's cell, any and all documents which identify the person or persons who ordered the copying of any writings seized from the Defendant's cell, any and all documents which in any way memorialize any conferences of law enforcement officers concerning the seizure or copying of any documents from the Defendant's cell (the term "law enforcement officers" means state, federal and local officers including any employees of the Charleston County Detention Center and any attorneys or investigators employed by the Ninth Circuit Solicitor's office, including the elected Solicitor, or employed by the United States Attorney's Office for the District of South Carolina).

6. A complete copy of Dylann's Roof's inmate file.

The Defendant also asks this Court to issue its Order which requires Chief Jailer W. Beatty to deliver copies of the above listed documents to the undersigned or his representative within forty-eight hours of service of the subpoena *duces tecum*.

The undersigned attorney for the Defendant finds the documents listed above are necessary to provide effective representation to the Defendant who is facing a possible sentence of death.

The Defendant was found to be indigent at his arraignment by the Magistrate Judge. He asks that the witness fees be paid in the same manner as those paid for witnesses the Government subpoenas.

Respectfully Submitted,

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